



July 28, 2023

Casey Sixkiller
Regional Administrator
US Environmental Protection Agency, Region 10
1200 6th Ave, Suite 155
Seattle, WA 98101

Dear Regional Administrator Sixkiller:

On behalf of Puget Sound Pilots, thank you for the opportunity to comment on the US EPA Proposed Plan for the East Waterway Operable Unit remedial action.

Puget Sound Pilots is the organization that provides state-mandated pilotage services to certain U.S. and all foreign flagged vessels calling Puget Sound. We represent approximately 50 master mariners that protect the port and the environment from a threat of a marine casualty and to ensure the safe and orderly flow of maritime commerce into our waters. Puget Sound Pilots serve the entire diverse mix of ships entering and exiting Puget Sound -- container ships, bulk cargo carriers, large fishing/processor vessels, and cruise ships.

Puget Sound Pilots is a strong supporter of the Seattle Harbor Navigation Improvement Project (SHNIP) and we are concerned the proposed cleanup process may delay the planned deepening of the East Waterway, a critical element of the SHNIP. We understand that USACE's position is that the deepening project cannot proceed under an interim cleanup. The SHNIP is extremely important to providing safe harbors for commercial cargo ships and to maintaining the competitiveness of NWSA's Seattle terminals. It is critical to Puget Sound Pilots that NWSA terminals remain a top-tier, big ship ready gateway.



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If the USACE is unable to deepen the waterway, it will limit NWSA's ability to receive as many calls from larger vessels, and those vessels that do call will load and unload less cargo than they would if the waterway is deepened as planned. A trend in the shipping industry is the rapid growth in the size of container vessels. Today, the NWSA receives regular calls from vessels with capacities of up to 15,000 TEUs (twenty-foot equivalent unit containers), more than twice the capacity of the average sized vessel that called NWSA terminals just ten years ago. Ocean carriers are continuing to emphasize economies of scale and increasingly are only calling at ports that can accommodate these larger ships. Without sufficient capacity for big ships at the NWSA's Seattle terminals, the region will lose export opportunities and its position in the global economy will suffer.

We strongly encourage EPA to adopt a cleanup plan that allows the deepening project to be completed as soon as possible. Most importantly, the EPA should issue a final record of decision and undertake a final, not interim cleanup action. This will give USACE the confirmation it needs to begin design and construction of the deepening project. Given the long timeline of the proposed cleanup and potential monitoring periods, however, we also encourage EPA to work with USACE to coordinate construction of the deepening and cleanup concurrently and to complete the work as soon as possible.

Thank you for taking the time to consider the economic importance of the East Waterway as you develop the cleanup plan. We are confident the region can find solutions that meet each agency's goals as well as the needs of local communities and Northwest businesses that rely on robust, competitive trade through the region's premier international gateway.

Sincerely,



Charles Costanzo
Executive Director